

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

Civil Action No.: 04-30058 MAP

BETTINA SNYDER,
DONALD SNYDER and
C S INDUSTRIES, LLC,

Plaintiffs,

v.

GLENN T. DAVIS

Defendant.

**JOINT STATEMENT REGARDING SCHEDULING CONFERENCE
WITH PROPOSED PRETRIAL SCHEDULE PURSUANT TO LOCAL RULE 16.1**

Pursuant to the Court's June 23, 2004 Notice of Scheduling Conference, the Parties conferred pursuant to Fed. R. Civ. P. 26(f) on July 7, 2004. At the 26(f) conference the Parties agreed to the following proposed pretrial schedule.

Automatic Discovery will be exchanged by **August 20, 2004;**

Interrogatories and Request for Production will be served on or before **September 15, 2004;**

All non-expert depositions will be completed and all fact discovery will close on **November 5, 2004;**

Prior to designation of experts and a final schedule for motions, counsel will appear for an interim status conference on or about **November 12, 2004.**

The Parties certify that that they have conferred as required by Local Rule 16.1 with a view of establishing a budget for the costs of conducting the full course, and various alternative courses, of litigation and to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4. The Parties respectfully request that each party be allowed to file a certification within seven days of this conference.

Respectfully submitted,

Dated: July 21, 2004

By: /s/ Mark H. Bluver
Mark H. Bluver, Esquire
BBO # 560330

SHATZ, SCHWARTZ & FENTIN P.C.
1441 Main St., Suite 1100
Springfield, MA 01103
(413) 737-1131 Phone
(413) 736-0375 Fax
Attorneys for the Plaintiffs

and

By: /s/John G. Bagley(with permission)
John G. Bagley, Esquire
BBO #026050

Susan D. Sachs, Esquire
BBO # 556201

MORRISON, MAHONEY & MILLER, LLP
1500 Main Street, Suite 2400
P.O. Box 15387
Springfield, MA 01115-5387
(413)737-4373 Phone
(413)739-3125 Fax